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Attorneys for Plaintiffs and the Settlement Class

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

CHRIS SMITH, CHERYL SMITH, KAREN
SMITHSON, ALBERTO CORNEA, FRANK
ORTEGA, MICHELLE ROGERS, DEBORAH
CLASS, AMBER JONES, ALEXIS KEISER,
LOORN SALEE, THOMAS PEAR, and
TANNAISHA SMALLWOOD, individually and
on behalf of all other similarly situated
individuals,

Plaintiffs,

v.

APPLE INC.,

Defendant.

No. 4:21-cv-09527-HSG

Second Declaration of Chris Smith in
Support of Plaintiffs' Motion for Final
Approval of Class Action Settlement

CLASS ACTION

Dept.: Courtroom 2
Judge: Hon. Haywood S. Gilliam, Jr.

Date: April 10, 2025
Time: 2:00 p.m.

Third Amended Complaint Filed: October
31, 2023

I, Chris Smith, declare as follows:

1. I have personal knowledge of the facts stated herein and, if called upon to do so, could competently testify thereto.

2. These hours are likely substantially understated because I was not instructed to keep track of the time I spent on this case. The hours and task descriptions are provided as a good faith estimate. Below is a summary of the approximate hours that I spent participating in this case:

Date	Named Plaintiff	Time	Description
9/8/2020	Chris Smith	0.5	Took photographs of injuries
9/9/2020	Chris Smith	17.5	Online research regarding screen detachments, customer reviews, complaints, etc. (over several days)
10/14/2020	Chris Smith	0.25	Research on Apple Watch warranty through http://checkcoverage.apple.com
12/14/2020	Chris Smith	1.25	Brought watch to the Best Buy at Eastern Shore Center re: coverage for detached screen and Apple Screen Replacement Program
12/15/2020	Chris Smith	7.5	Research on Apple Watch Screen Replacement Program (over several days)
3/25/2021	Chris Smith	1.5	Met with Plaintiffs' Counsel
3/25/2021	Chris Smith	0.5	Photographs of injury/scar with investigator for Plaintiffs' Counsel
4/27/2021	Chris Smith	1.25	Collected and mailed Apple Watch accessories to Plaintiffs' Counsel
7/28/2021	Chris Smith	0.5	Reviewed and signed Attorney Representation Agreement
8/20/2021	Chris Smith	0.25	Reviewed and signed CLRA declaration
12/3/2021	Chris Smith	1.25	Reviewed the original Complaint
12/4/2021	Chris Smith	0.25	Communication with Plaintiffs' Counsel
7/26/2022	Chris Smith	0.25	Reviewed and signed a Request for Release of Information for medical records
8/14/2022	Chris Smith	0.5	Communication with Plaintiffs' Counsel
8/15/2022	Chris Smith	0.75	Collected documents for discovery responses (including photographs taken at hospital and Apple Watch receipt)
8/16/2022	Chris Smith	0.5	Communication with Plaintiffs' Counsel
8/22/2022	Chris Smith	1.25	Reviewed and approved discovery responses (ROGS, RFP & RFI)
9/6/2022	Chris Smith	1	Met with Plaintiffs' Counsel
3/16/2023	Chris Smith	0.5	Reviewed and approved the Second Amended Complaint

1	4/11/2023	Chris Smith	0.75	Reviewed and approved First Supplemental Discovery Responses (ROGS & RFP)
2	5/17/2023	Chris Smith	0.25	Communication with Plaintiffs' Counsel
3	5/19/2023	Chris Smith	0.5	Reviewed and approved Second Supplemental Discovery Responses (ROGS)
4	6/9/2023	Chris Smith	0.25	Reviewed and approved responses to Second ROGS & RFP
5	6/30/2023	Chris Smith	0.5	Reviewed and approved responses to First RFA
6	7/11/2023	Chris Smith	0.25	Communication with Plaintiffs' Counsel
7	7/13/2023	Chris Smith	0.5	Reviewed and approved responses to Apple's Third ROGS
8	8/24/2023	Chris Smith	0.5	Discussed scheduling and travel for deposition anticipated to be taken in San Francisco, CA
9	1/12/2024	Chris Smith	0.25	Reviewed update by Plaintiffs' Counsel
10	1/24/2024	Chris Smith	0.25	Reviewed update by Plaintiffs' Counsel
	5/3/2024	Chris Smith	0.25	Reviewed update by Plaintiffs' Counsel
	11/11/2024	Chris Smith	0.25	Reviewed update by Plaintiffs' Counsel
11	TOTAL			41.75

VERIFICATION

Under penalties of perjury, I declare that I have read the foregoing declaration and it is true and correct to the best of my knowledge and belief.

By: 

Printed Name: Chris Smith

STATE OF Alabama

COUNTY OF Baldwin

1 Dated: April 30, 2025

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2 /s/ Lucy E. Tufts

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